

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

Chris Schroeder
Plaintiff

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case: 2:22-cv-11387
Judge: Michelson, Laurie J.
MJ: Patti, Anthony P.
Filed: 06-17-2022 At 11:15 AM
CMP CHRIS SCHROEDER V FIDELITY
INVESTMENTS INC ET AL (SS)

Jury Trial: Yes No
(check one)

v.
Fidelity Investments, Inc,
NFS, FBS Fidelity Brokerage
Services LLC., & Does ET. AL.
Defendants

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

CHRIS SCHROEDER
38510 MONMOUTH STREET
WESTLAND WAYNE
MI 48186
(734) 536-7397
15THPROJECTS@GMAIL.COM

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name

Fidelity Investments Inc,
NFS, FBS Fidelity Brokerage Services, LLC.
200 Seaport Blvd.
Boston Suffolk
Massachusetts 02210
(800) 635-0472
Unknown

Job or Title
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address
(if known)

Defendant No. 2

Name

Ozzie

Job or Title
(if known)

Investment Advisor

Street Address

7676 Hazard Center Dr.

City and County

San Diego San Diego

State and Zip Code

CA. 92108

Telephone Number

800 635-0472

E-mail Address
(if known)

Defendant No. 3

Name	<u>Conrad</u>
Job or Title (if known)	<u>Investment Advisor</u>
Street Address	<u>7676 Hazard Center Dr.</u>
City and County	<u>San Diego</u>
State and Zip Code	<u>San Diego CA 92108</u>
Telephone Number	<u>(800) 635-0472</u>
E-mail Address (if known)	

Defendant No. 4

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

Federal question

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Under Federal law on public accommodation the law says, "citizens cannot be deprived a service at a business based on race." 42 U.S.C. § 2000a All persons shall be entitled to the full & equal enjoyment of goods, services, facilities, privileges, advantages & accommodations of any place of public accommodation as defined in this section, without discrimination on the ground of race, color, religion, or national origin.

B.

If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) CHRIS SCHROEDER, is a citizen of the State of (name) MICHIGAN.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Ozzie, is a citizen of the State of (name) California. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) FIDELITY INVEST., is incorporated under the laws of the State of (name) MASSACHUSETTS, and has its principal place of business in the State of (name) MASSACHUSETTS. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

C. The defendant Conrad is a citizen of the state of California.
(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy ~~June 15, 2012 BTC price \$20,591.70 - \$1000 (BTC price 2/2/17) Lost revenues of \$250,425 + lost ROI 19,591.70 = \$270,016.70~~

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

~~Plaintiff was intentionally denied access to approximately \$1,000 of Plaintiff's own money preventing Plaintiff from investing in BTC & preventing business owner Plaintiff from operating a 2005 entity with website purchased for cash 1/26/16. Entity won 3rd prize in SDSU Venture Start competition & was recognized as a Plaintiff's marketplace. Defendants unlawful act cost investment ROI & Cash flow revenue to the entity that was a nonprofit S.W.C. social welfare company.~~

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The Plaintiff is 1994 graduate of Cal State Fullerton with degree in Entrepreneurial Business Management study & has created & or purchased multiple businesses including the nonprofit noted above. Plaintiff has skill in marketing as proven with snow plow company that had upwards of 500 clients from 2000 to 2004. The defendants denied access to a Nike stock check worth \$766.03 + "022/jel" a hispanic office worker who lied & said overnight envelope on top of stack of mail was not mine on 3/16/17 kept that check & Plaintiff never got that check. It was replaced months later on 12/30/17. There was differing treatment & racial discrimination from Ozzie of Fidelity office at 7676 Hazard Center Dr. Suite 820 San Diego, CA 92108 & Conrad (office manager) acting on obvious lies of his co-worker ultimately restricted my stock trading account without ever explaining why. While at client computer kiosk station & on phone 3/14/17 at Hazard Center Fidelity office talking to Computer share stock transfer agent they agreed to send the Nike stock check of \$766.03 overnight because stock sale was 1/30/17 & check still had not arrived to my San Diego PO Box. While on that call I asked Fidelity office worker (Asian gentleman name unknown yet only Asian working there) if the check could be shipped there overnight, he said "yes".

My intention was to purchase a bitcoin. My YouTube channel, Joe Schroeder has 8/2/16 video <https://youtu.be/q964TPifHMc> where I predict BTC would go to \$100 in the coming months. In December 2017 BTC rose to \$19,834.93 & broke above \$20,000 that December. Due to Ozzie's unlawful discrimination I did not get the financial return on my Nike proceeds I owned long term since 2005 never before having sold. Plaintiff was unlawfully denied the opportunity to manage Plaintiff's own money. Conrad the office manager of the Hazard Center Fidelity spoke with me on the phone the next day & said, "Fidelity is ending the business relationship with you." Obviously Ozzie made up some sensationalist lie as I did nothing wrong. I simply waited at their office for my overnight check, &

that afternoon when the stack of mail, boxes, & envelopes arrived Ozzie grabbed said items at front door of office suite & headed immediately toward the back office door. About half way there I walked up to Ozzie & asked him for the overnight envelope on top of the stack & he abruptly said, "that's not yours." He had not even looked at the envelope to see name on it & he knew it was mine, everyone at the office knew I was waiting for that envelope. The representative from Computershare in Boston was not helpful either as he never got back to me with a tracking number for me to track envelope, that's why I had to wait at Fidelity all day. Charles McDonough the representative from Computershare actually said to me, "I got to get my driveway shoveled," while I'm financially challenged MBA student at San Diego State University cashing on \$766.03 for BTC investment. Waiting since 11/30/17 for check I was forced to liquidate, electronically that time, another approximately \$255.00 of Nike stock. Nothing above, the conversation with Conrad the next day, he had no concern or discussion about my envelope with check in it, his only concern was telling me, "you are no longer allowed at the Fidelity office.

Something that neither Ozzie nor Conrad was aware of was fact that I talked to Mr. Grinderson about Fidelity Trust tools & was planning on having appointment to talk about a Trust for my Father who told me in Dec. 2015 that his net worth was \$1.5 million that all 6 kids were loved equally & each would get equal 1/6 share. The opportunity to explore Trust options for my Father was unlawfully denied from Ozzie & Conrad. The discrimination is going on to this day as December 8, 2021 the IRS attempted, electronic deposit of my \$2,125.00 Tax Return check to my individual Fidelity account & it wasn't allowed to be deposited. I still do not have that \$2,125.00 check yet. When a student is counting on money & free time is very limited the student should not be subject to the whims of prejudice office workers at Fidelity or any place else. With reference to my Father's & Mother's Trust & because of lack of involvement in Trust tools from Fidelity in 2017 I receive \$1500/month from the Trust instead of a lump sum pecuniary bequest. Incidentally, my Father had approximately \$400,000 in his Fidelity account at the time of the disparate treatment. It's possible that Ozzie & Conrad knew this because My Father & I as Fidelity account holders shared the same address at one point in 2008. Pulling up accounts with the same last name & same address would be possible.

Review website unilocal.co.uk/united-states/san-diego/fidelity-investments-62219 has reviews of Fidelity Investments & Larry L. of San Diego, CA had similar experience. His online review of Fidelity says, "I asked

the question <<if it is a managed account shouldn't they out perform the S&P 500>> They locked my account & forced me to close it. So be careful of what you say to them. I went to TD Ameritrade & have made money since then." Plaintiffs not only one to be locked out of own account yet my experience as noted above included unlawful denial of own funds for racist reasons.

The ongoing act of denying me access to the tools of my account like receiving funds, paying bills, & investing is unlawful ongoing illegal act of denying full & equal enjoyment of goods, services, facilities, privileges, advantages, & accommodations of any place of public accommodation as defined under law without any of the discrimination based on race, color, religion, or national origin. Fidelity never provided a reason for account suspension, likely because there was no valid reason, & the Plaintiff is entitled to the full access of investment account. Log in to account has never been affected yet once logged no account features like adding money or investing work.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff was & is entitled to the Goods & Services that all Fidelity clients receive. As relief Plaintiff asks court order account access granted. Actual damages occurred in loss of business for the fee charging member based community Platform & Marketplace Nonprofit (S.W.C.) Known as SDSUTimeBank.com the loss of salary. Community Weaver software ran the member Platform & thus the entity was turn key passive income going through to Plaintiff in form of salary, much like an LLC income goes through to owner. The member base is 15 individuals, \$25 for families, & \$100 for businesses on annual base. The purchased entity in 2016 had approximately 265 members. Revenues were projected to double each year. Revenues sought '17 \$3975, '18 \$7950, '19 \$15,900, '20 \$31,800, '21 \$63,600, & '22 \$127,200. The only operating expense is marketing that can be done online at low or no cost. BTC investment would have provided income of approximately \$19,591.70 Plaintiff seeks that Actual damage. Plaintiff entitled to actual damages because defendants via employees denied operating capital. Plaintiff seeks punitive damages at \$100,000.00 & or any additional amount that the court deems to be fair & just.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 6/17, 2022.

Signature of Plaintiff

Printed Name of Plaintiff

Chris Schröder
CHRIS SCHROEDER

Additional Information:

During the 1980's Microsoft won a breach of contract lawsuit for \$50,000 approximately. That money was Microsoft's operating capital. Cash flow is important to every business & even a small amount of cash could be turned into much larger sums of revenue.

During the hours spent at Fidelity office at Hazard Center San Diego utilizing the "Client Service Center", Plaintiff was polite, professional, & informative. There was no issue at all & I told the office reps that I was working on MBA at SDSU, plus they knew Plaintiff was counting on overdue check. Plaintiff even provided some valuable investment advice from all the University research Plaintiff worked on. In conversation with a couple Fidelity agents Plaintiff said, "The best stock right now is Tesla, it's going to go up \$100.00 in the next couple months." When giving that friendly advice (via Plaintiff's research) Tesla was at a split adjusted \$145 approximately in March of 2017 & it did rise \$100 & more soon after. In fact, it wasn't long till the stock price hovered around \$350. It's likely some or all the Fidelity reps. at that office took that advice & provided it to their clients. As a thank you Plaintiff's account was suspended without cause.

The minimal dollar amount in account & knowledge that Plaintiff was MBA student should not affect access. MBA course payment was due within 12 months, payment was not made.

CIVIL COVER SHEET

County in which action arose: _____

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The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

CLERK COPY

I. (a) PLAINTIFFS

Chris Schroeder

(b) County of Residence of First Listed Plaintiff
(EXCEPT IN U.S. PLAINTIFF CASES)

Wayne

DEFENDANTS

Fidelity Investments, Inc.

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Chris Schroeder Pro Se

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

<input type="checkbox"/> 1 U.S. Government Plaintiff	<input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)
<input type="checkbox"/> 2 U.S. Government Defendant	<input checked="" type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Citizen of This State	<input checked="" type="checkbox"/> PTF	<input type="checkbox"/> DEF	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> PTF	<input checked="" type="checkbox"/> DEF
Citizen of Another State	<input type="checkbox"/> 1	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 4	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 4	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 7

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> PERSONAL INJURY	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability			<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander			<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability			<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 345 Marine Product Liability		<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 835 Patent - Abbreviated New Drug Application	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 880 Defend Trade Secrets Act of 2016	<input type="checkbox"/> 485 Telephone Consumer Protection Act
<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 385 Property Damage Product Liability		
<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice			
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	SOCIAL SECURITY	
<input type="checkbox"/> 210 Land Condemnation	<input checked="" type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> Habeas Corpus:	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 890 Other Statutory Actions
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 530 General	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 865 RSI (405(g))	
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	<input type="checkbox"/> Other:		
U40	<input type="checkbox"/> 448 Education	<input type="checkbox"/> 540 Mandamus & Other	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	<input type="checkbox"/> 896 Arbitration
		<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
		<input type="checkbox"/> 555 Prison Condition		<input type="checkbox"/> 950 Constitutionality of State Statutes
		<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		
IMMIGRATION				
		<input type="checkbox"/> 462 Naturalization Application		
		<input type="checkbox"/> 465 Other Immigration Actions		

V. ORIGIN (Place an "X" in One Box Only)

<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from Another District (specify)	<input type="checkbox"/> 6 Multidistrict Litigation - Transfer	<input type="checkbox"/> 8 Multidistrict Litigation - Direct File
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Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

42 U.S.C. § 2000a

VI. CAUSE OF ACTION

Brief description of cause:

denied equal enjoyment of goods, services, facilities, privileges & accommodations

VII. REQUESTED IN COMPLAINT:

 CHECK IF THIS IS A CLASS ACTION
UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions).

JUDGE

DOCKET NUMBER

DATE

6/16/2022

SIGNATURE OF ATTORNEY OF RECORD

Chris Miller Pro Se

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE



Chris Schroeder
38510 Plymouth Street
Westland, MI 48186

NO POST MARK

U.S. District Court for Eastern
District of Michigan
Clerks Office
Theodore Levin United States Courthouse
Room 529
231 W. Lafayette Blvd.
Detroit, MI 48226

RECEIVED
JUN 22 2022
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